

MIE (Rev.04/18) Motion and Brief in Support

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

Plaintiff(s),

v.

DEFENDANTS' IN REM

Defendant(s).
_____ /

Case No. 19-cv-12313: 20-mj-30135
& 20-mc-50585

Judge AVERN COHN

Magistrate: Anthony P Patti

**MOTION FOR
ORDER(S) TO CONSOLIDATE, QUASH, IMPEACH, AND OR VACATE AND
OR SET ASIDE AND OR DISMISS ALL COMPLAINTS, AND WARRANTS**

I, OYENIRAN A OYEWALE, appearing *pro se*, respectfully request that the Court order to consolidate and impeach and or set aside and or vacate and or dismiss the the complaints, warrants (void order) granted by this court in the instant and all case(s) related.

for the reasons that follow in the attached brief in support of this motion.

E.D. Mich. Local Rule 7.1 requires that the parties attempt to agree on what you are asking for in this motion before filing it with the Court. Accordingly, I certify that:

☐ I contacted the opposing party/parties to explain my request. The opposing party/parties

_____ my request.

OR

☒ I attempted to contact the opposing party/parties by

email to the office of the Attorney General of the United States / VIA

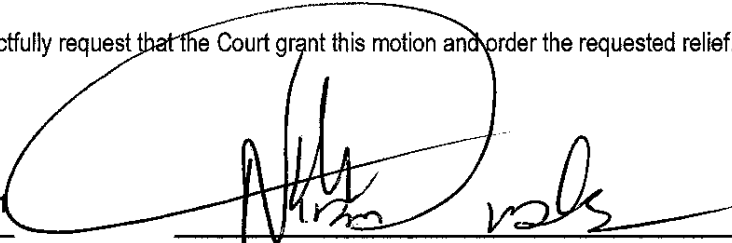
_____ michael.el-zein@usdoj.gov this day Sept 24th / 2021

_____ but was unable to discuss my request with the opposing party/parties.

MIE (Rev.08/2020) Motion and Brief in Support

WHEREFORE, I respectfully request that the Court grant this motion and order the requested relief.

Dated: September 24, 2021

A handwritten signature in black ink, appearing to read 'Oyeniran A Oyewale', is written over a horizontal line. The signature is stylized and cursive.

Signature

OYENIRAN A OYEWALE

Printed Name

12 CARRIAGE WAY

Street Address

NORTH PROVIDENCE, RI 02904

City, State, and Zip Code

401 527 2964

Telephone Number

BRIEF IN SUPPORT OF MOTION

STATEMENT OF ISSUES PRESENTED

1. Whether the Court should order:
in the interest of Justice, public policy and protection of Constitutional rights in the Constitution, FREEDOM OF CONTRACT, and the required due process of the law, equal protection of the law, right to liberty and property amongst others enshrined in the Constitution, in these matters under case(s) number 19-cv-12313, 20-mc-50585 and or 20-mj-30135,
 - a) where the order(s) (warrants) rendered or granted by this court prior to and or on the Sept 17th / 2021 are NULL and VOID by settled law and or are conflicted with the provisions under the 4th, 5th, 6th, and 14th Amendments of the Constitution and or are in contravention of the Constitutional Provisions and any of the laws of the United States of America ?
 - b) where the court that rendered or granted the said order(s) (warrants) lack(s) or lacked the jurisdiction and or subject matter jurisdiction and in violation of due process?
 - c) where the court that rendered or granted the said order(s) (warrants, acted in a manner inconsistent with due process of law and or the Constitution of United States ?
 - d) where the court that rendered or granted the said order(s) (warrants, exceed(s) or exceeded its power to render or grant the particular order(s) (warrants) and in violation of the due process of the law and or the Constitution of the United States of America ?
2. Whether the court that lacks jurisdiction and or lost the subject matter Jurisdiction or lacked the subject matter jurisdiction, and or violated the required due process of the law, can re-confer to itself the jurisdiction over the same subject matter ?
4. Whether a void and null order(s) (warrants) and or unaccepted order(s) (warrants) granted on September 17th 2021 or in these instant matters, can moot the complaints (Motions) of the Defendant(s), raised over the violations of the substantial rights to due process of the law, equal protection of the law, right to liberty and property, right to be paid as employee(s), right of business to earn pay as enshrined under the 4th, 5th, 6th and 14th Amendments of the Constitution and other relevant provisions therein, as well as amongst other laws of the United States of America ?
5. Whether the affiant, and or Plaintiff and or officer(s) of this Court, are to be allowed to toy with or defraud the Judicial machinery AND OR to fraudulently subvert the integrity of the judicial process without judicial consequence, as in these matters that, this court now cannot perform its required function as a fair or neutral arbiter of Justice ?

I ADDITIONALLY ADOPT AND RELY ON SAME ISSUES, POINTS AND ARGUMENT PLEADED BY THE DEFENDANT(S) IN THE CASES UNDER 20-MJ-30135 AND 20-MC-50585 , AS WELL AS THOSE IN MY MOTION(S) AND SUPPORTING BRIEFS

CONTROLLING OR MOST APPROPRIATE LEGAL AUTHORITY

(List any federal laws, court cases, court rules, etc., that support your request. This may include the Federal Rules of Civil Procedure and the Court's local rules.)

I ADDITIONALLY ADOPT AND RELY ON SAME ISSUES, POINTS AND ARGUMENT PLEADED BY THE DEFENDANT(S) IN THE CASES UNDER 20-MJ-30135 AND 20-MC-50585, AS WELL AS THOSE IN MY MOTION(S) AND SUPPORTING BRIEFS

4TH, 5TH, 6TH AND 14TH AMENDMENTS OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA; CONSTITUTION OF THE UNITED STATES OF AMERICA; FEDERAL RULES OF CRIMINAL PROCEDURE; FEDERAL RULES OF CIVIL PROCEDURE; DISCLOSURE OF EVIDENCE ACT OF 2012;

See *Franks v. Delaware* 438 U.S. 154 (1978);

See *Griffen v. Griffen*, 327 U.S. 220, 66 S. Ct. 556, 90 L. Ed. 635, where an unnotified pro se litigant won his case in the Supreme Court who relied on the required due process of the law amongst others (SIMILAR TO THE INSTANT CASE - NOT NOTIFIED OR SUMMON TO APPEAR FOR HEARING, TO DETERMINE IF THE WARRANT(S) WERE NECESSARY, AMONGST OTHERS, PRIOR TO THE WARRANTS BEING REPEATEDLY ISSUED AGAIN ON SEPT 17TH 2021);

See *ASHCROFT, FORMER ATTORNEY GENERAL, ET AL. v. IQBAL ET AL.*, CITE AS 556 U.S (2009), No. 07 - 1015.

See U.S Supreme Court, in the case of *Mullane v. Central Hanover Bank* (1950), determined that due process requires, at a minimum: (1) notice; (2) an opportunity to be heard; and (3) an impartial tribunal;

Loving v. Virginia (12 Jun 1967) equal protection of the law; *Regents of the University of California v. Bakke* (26 Jun 1978); *Goldberg v. Kelly*, 397 U.S. 254, 271 (1970), wherein stated, "The neutrality requirement helps to guarantee that life, liberty, or property will not be taken on the basis of an erroneous or distorted conception of the facts or the law; SEE ALSO 1970 case of *Goldberg v. Kelly*; *Mathews v. Eldridge* (1976) where Courts evaluate the procedure for depriving someone of a "new property" right by considering: (1) the nature of the property right; (2) the adequacy of the procedure compared to other procedures; and (3) the burdens that other procedures would impose on the state;

A void order is a nullity from the beginning, and is attended by none of the consequences of a valid order. It is entitled to no respect whatsoever because it does not affect, impair, or create legal rights." *Ex parte Seidel*, 39 S.W.3d 221, 225 (Tex. Crim. App. 2001), *Ex parte Spaulding*, 687 S.W.2d at 745 (Teague, J., concurring).

ARGUMENT

(Explain why request should be granted. State how any rules, statutes, or cases support your request. You may also refer to documents to support your request. These documents should be attached as exhibits, unless they were previously filed with the Court.)

I, ALSO TO THIS MOTION, RELY ADDITIONALLY ON THE PREVIOUS MOTIONS, BRIEFS AND EXHIBITS THERETO FILED IN THESE MATTERS ON AUGUST 24, 2021, AUGUST 30, 2021, SEPTEMBER 02, 2021 AND SEPTEMBER 10, 2021. SEE ALSO ATTACHED.

ANSWERS TO QUESTION 1, 2 AND 3 ISSUES

The 14th amendment of the United States Constitution gives everyone a right to due process of law and equal protection of the law, which includes order, decisions, judgment, warrant(s) inter alia, THAT COMPLY WITH THE RULES AND CASE LAW.

"Courts are constituted by authority and they cannot go beyond that power delegated to them. If they act beyond that authority, and certainly in contravention of it, their judgments or orders are regarded as nullities; they are not voidable, but simply void, and this even prior to reversal." (see WILLIAMSON v. BERRY, 8 HOW. 945, 540 12 L. Ed. 1170, 1189 [1850]).

It is settled law that, whether the defendant (defense) requests it or NOT, the officer(s) of the attorney general (prosecutors), MUST disclose "BRADY MATERIAL" TIMELY to the defendant(s) (defense) and that the FAILURE to do so, SUCH MATERIAL is a 'brady material' to the defense (Defendant), AND THAT THE FAILURE TO DISCLOSE such material, IS A "BRADY VIOLATION", a violation of the Constitution of the United States of America.

See the Supreme Court case of Brady v. Maryland of 1963 and others relied on above;

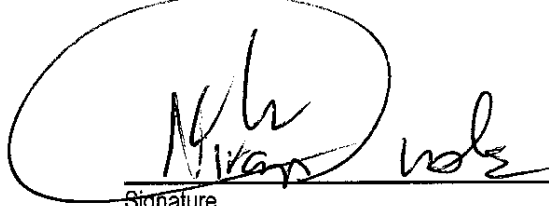
I respectfully and humbly submit and urge this honorable court so to hold that, FAILURE of the office of the Attorney General in these matters and or FAILURE of Mark Chasteen and or Michael El-Zein and or agent "JOHN KRAEMER, to TIMELY disclose or produce the supporting evidence of the facts alleged in the affidavits in these matters and or FAILURE to disclose or produce the withheld EXCULPATORY supporting evidence in these matters (Whether the defendant request it or not), that led to the probable cause to believe the facts alleged in the affidavits of agent John Kraemer to obtaining and granting the orders warrants, TO VIOLATING THE CONSTITUTIONAL RIGHTS TO LIBERTY, PROPERTY, EQUAL PROTECTION AND DUE PROCESS OF THE LAW - (that WHICH ITS DISCLOSURE could impact the decision or orders or warrants in these matters in favor of the defendant(s), to be rejected or voided or impeached or dismissed or vacated), - TIMELY TO THE DEFENDANTS and or TO THIS Court, IS A VIOLATION OF THE CONSTITUTION OF THE UNITED STATES, AND THEREFORE ARE NULL AND VOID.

And further to hold that Constitutional issue(s) are substantial issues in these matters, for this Court to grant all the motions of the Defendant(s) and all the reliefs sought pursuant Rule 37 (a) (3) of the Federal Rules of Criminal Procedure. See FISHER v. BAKER, 203 U.S. 174, 181 1906

MIE (Rev.08/2020) Motion and Brief in Support

WHEREFORE, I respectfully request that the Court grant the motion.

Dated: September 24, 2021

A handwritten signature in black ink, appearing to read "N/A Oyewale", is written over a horizontal line. The signature is circled with a large, hand-drawn oval.

Signature

OYENIRAN A OYEWALE

Printed Name

12 CARRIAGE WAY

Street Address

NORTH PROVIDENCE, RI 02904

City, State, and Zip Code

401 527 2964

Telephone Number

MIE (Rev.08/2020) Motion and Brief

CERTIFICATE OF SERVICE


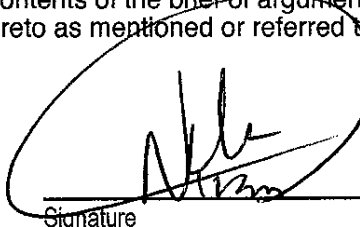
I certify that on this date Sept 10, 2021, I mailed by United States Postal Service this document to

the following:

VIA EMAIL TO MICHAEL.EL-ZEIN@USDOJ.GOV

I already SENT via the email, the contents of the brief of argument in support of the motion(s) as well as the exhibits thereto as mentioned or referred to herein.

Dated: September 24, 2021



Signature

OYENIRAN A OYEWALE

Printed Name

12 CARRIAGE WAY

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NORTH PROVIDENCE, RI 02904

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Telephone Number

UNITED STATES DISTRICT COURT
EASTERN DISTRICT, MICHIGAN

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Case numbers : 19-CV-12313
: 20-mj-30135
: 20-MC-50585

Honorable ; Avern Cohn
Mag. Judge: Anthony P. Patti

**DEFENDANTS' *in rem* BRIEF IN SUPPORT OF MOTION(S) TO CONSOLIDATE,
TO QUASH AND OR DISMISS AND OR SET ASIDE AND OR VACATE AND OR
IMPEACH ANY AND EVERY FORFEITURE ORDER(S), SEIZURE WARRANT(S)
AND EVERY COMPLAINT OR AMENDED COMPLAINT(S) ASSOCIATED WITH
OR RELATED TO OR IN RESPECT OF THIS MATTER / CASE NUMBER 19-CV-
12313 - THAT IS/ARE IN VIOLATION OF THE DUE PROCESS OF THE LAW
AMONGST OTHERS AND OR THE 4TH, 5TH, 6TH, 10TH AND 14TH
AMENDMENTS AND ARTICLE III SECTION 2 OF THE CONSTITUTION OF THE
UNITED STATES OF AMERICA**

&

**OPPOSITION & CONTEST AGAINST ANY SEIZURE OR FORFEITURE IN RESPECT OF THIS MATTER AND RELATED
TO THIS MATTER**

A. INTRODUCTION

I, OYENIRAN A. OYEWALE, hereby state as follows that:

1. I am a male resident of the State of Rhode Island in this matter and a former employee of Touch of Fame Group registered in the jurisdiction of the State of Georgia in the United States of America;
2. I and my wife Olubunmi Oyewale had maintained bank account number ending in 7788 with Citizens Bank and I also had maintained another bank account number ending in 5138 in the name of For His Glory Project, both of which contained the 'defendants in rem' as my property and are/were located in the jurisdiction of the State of Rhode Island;
3. By virtue of my position, I am duly authorized to make and depose to this brief amongst others, on behalf of myself, my wife and "For His Glory Project", and the facts contained herein are within my personal knowledge or belief, unless the contrary appears from the context, and are to the best of my knowledge and belief, to be true and correct.

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4. It is in the interest of justice and the beholden of the honorable Court to the Constitution of the United States of America, for this Court to consolidate case numbers 20-mj-30135 and 20-mc-50585 and all known and unsealed related cases to this instant suit to be brought together for a complete view of all that's been ongoing in relation to this instant case under 19-cv-12313.
5. I also learnt that related cases under 20-mj-30135; 20-mc-50585 do indeed exist and of which I didn't even have prior knowledge of and I respectfully urge this Court as arbiter of justice, to gather all affiliated and related files to this instant matter, before any decision is made.
6. I had no prior knowledge of any existence of initial affidavit of complaint that gave birth to the seizure warrant obtained on March 5, 2019 in this matter, but suddenly I took cognizance of the amended complaint for forfeiture that I never even knew existed prior to obtaining the warrants in March 2019. It now occurred to me that there has being huge violation of the 4th 5th 6th 8th 10th and 14th Amendments of the Constitution of the United States of America amongst others, that cannot be ignored.
7. I attach hereunto the initial affidavit of complaint as well as the amended complaint made in the related matters under 20-mj-30135 and 20-mc-50585 as exhibits ***already in this Court under cases 20-mj-30135 and 20-mc-50585.*** I learnt that the motions filed by my former employer gave birth to the said exhibits.
8. I learnt also that this Court indeed ordered the plaintiff to respond to the motions filed in the said related matters, of which bore the amended complaint in this instant matter and as well as the said related matters. I refer hereunto the said 2 court orders of this court in the said related matters as ***already in this Court under cases 20-mj-30135 and 20-mc-50585..***
9. I also learnt that my former employer had filed against the fraudulent misrepresentations and or recklessly false allegations knowingly contained in the initial affidavit of complaint see exhibits ***already in this Court under cases 20-mj-30135 and 20-mc-50585..***
10. My Constitutional rights and that of my families guaranteed in the Constitution have being impacted here so badly unconstitutionally that it cannot be left unaddressed. I have worked so hard that I am dedicated to serve God and humanity at large for my believe and I earnings are well deserved and it would be unconstitutional to violate my rights to deny me my right earnings paid to me for work performed for my former employer outside the United States Constitution;
11. I understood and learnt that my former employer filed to this Court that the affiants and the related officer(s) of this court had unconstitutionally violated the oath of their offices and the Constitution of the United States of America and further amongst other that, this Court had no jurisdiction where no crime occurred in the jurisdiction of Michigan as well as where no TRULY traceable proceeds of any crime

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was found in the Michigan jurisdiction, other than just false allegations made amongst others, in order to unconstitutionally confer jurisdiction to the State of Michigan where allegedly friends of Worldpay in this Court and in the USSS CAN TAKE CONTROL.

12. This is the United States of America where equality before the law is guaranteed regardless of race, ethnic background, belief, gender amongst others. GOD BLESS AMERICA.

BACKGROUND – JURISDICTION & USSS AGENTS' INTERVENTION

13. From the information gathered from the records of processes in this case, I learnt that the United States Secret Service intervention commenced by the inaccurate, recklessly false misrepresentation of facts and or fraudulent insufficient concerns and deceitful erroneous hearsays, recklessly false information reported by the Fifth bank officer Chris Allen that Worldpay is being defrauded by an entity Touch of Fame Group located in the State of Georgia and further that I shall refer to below as follows;
14. I learnt that the corporate investigator, Chris Allen "CA" employed at the Ohio head office of Fifth Third bank, reported to the United States Secret Service that fraud was committed against Worldpay, by my former employer Touch of Fame Group that registered as a Merchant with Worldpay and that it was via its terminal at the Savannah address in Georgia, 329 electronic checks were fraudulently processed by Touch of fame Group and its registered officers, and amounted to the loss of millions of dollars in this matter and deposited in the , allegedly maintained in the name of Touch of Fame Group. And as a result, the intervention of the United States Secret Service in the Jurisdiction of Michigan commenced. Prior to the intervention of the State of Michigan assigned USSS agents, there was no established crime confirmed - by the law enforcement officer(s) assigned to the Georgia jurisdiction, - to have being committed by myself or Touch of Fame Group via any existing terminal at the Savannah address location in Georgia jurisdiction as falsely alleged, **NEITHER** was any established crime confirmed, after investigation by the law enforcement agents assigned to Georgia jurisdiction, to have occurred via the terminal allegedly registered in the name of Touch of Fame Group NOR was any such terminal found at the Savannah address location Touch of Fame Group, AS REPORTED BY THE said corporate investigator of Fifth Third Bank;
15. I understood that the funds in the aforesaid bank accounts at the Citizens bank were blocked since the **year 2018** on the false allegation or misrepresentations basis that the said funds were **proceeds of fraud traceable to a crime committed by Touch of Fame Group via an e-Check terminal registered in the name of Touch of Fame Group - being a registered Merchant with Worldpay – located in the Jurisdiction of Georgia**, and in the **year 2019, March 5, the defendants In rem were seized on the order (federal seizure warrant) of this Court by the Magistrate Judge Elizabeth A. Stafford, on the basis that there was probable cause to believe that, crime was**

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committed via the e-Check terminal registered in the name of Touch of Fame Group as a Merchant with Worldpay, located in the the sovereign State of Georgia and that the **alleged crime or offense was committed by Touch of Fame Group** and the its registered officers;

The questions that arose here on the Constitutional grounds of the required due process of the law, equal protection of the law, fundamental fairness amongst others guaranteed in the 4th, 5th, 6th, 10th and 14th Amendments of the Constitution of the United States of America, are:

- a. *Whether there was reasonable or justifiable and or fair probable cause that crime was committed via an alleged e-Check terminal allegedly registered in the name of Touch of Fame Group as a Merchant with Worldpay, located in the the sovereign State of Georgia and that the alleged crime or offense was committed by Touch of Fame Group and the its registered officers, at the time the honorable Magistrate Judge Elizabeth A. Stafford on March 5th, 2019 granted or issued the federal seizure warrants in this matter ?*
16. In the year 2019, the officers of the United States Secret Service came by my residence for hearing over the aforesaid funds and I made my position clear to the said officers and I handed to the 2 officers, the written agreement on project for which I was paid by Touch of Fame Group. I attach hereunto the copies of the said written agreement as **"OO 1"**;
17. I filed my claim timely against the said seizure in the year 2019 to the United States Secret Service and I received a response. I attached hereunto the said response as **"OO 2"**;
18. In the year 2020 August, I enquired to the office of the Attorney General of the United States over the seizure if there's any pending matter against myself but to which **I received NO RESPONSE**;
19. **BUT SUDDENLY NOW IN THE YEAR 2021 LATE SEPTEMBER, after over 1 year of my enquiry, I received a response under "AMENDED COMPLAINT FOR FORFEITURE", against which NOW, to this Court, arose many CONSTITUTIONAL questions of the law, the Amendments and rights guaranteed in the Constitution of the United States of America, as to competence of the Eastern District Court of Michigan, the ground(s) of the seizure in the first instance in 2018, 2019 and 2020 prior to September 2021, but not limited to the followings:**
 - i. Whether this honorable Court of Michigan has the Jurisdiction in this matter where NO **LAWFULLY ESTABLISHED CRIME** IS/WAS lawfully determined to have being COMMITTED in the sovereign jurisdiction of Michigan, AND OR where NO lawfully established proceed(s) of crime was/were received or found in the jurisdiction of Michigan, as a result of a lawfully established or determined crime to have being committed in the sovereign jurisdiction of Georgia by former employer, TOUCH OF FAME GROUP ?;

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- ii. *Whether there's compliance with the required Due process of the law, equal protection of the law, amongst others guaranteed rights in the Constitution of the United States and of the Sovereign States of Georgia (former employer jurisdiction) and Rhode Island (my Residence) as referenced in the 10th Amendments of the Constitution of the United States in conjunction with judicial power granted under Article III Section 2 of the Constitution of the United States ?;*
- iii. *Whether the intervention by the officers of the United States Secret Service assigned to the jurisdiction of the State of Michigan over funds received from the former employer Touch of Fame Group, IS IN COMPLIANCE WITH THE CONSTITUTION OF THE UNITED STATES AND THE SOVEREIGN STATES OF GEORGIA AND RHODE ISLAND ?;*
- iv. *WHETHER there was reasonable probable cause INITIALLY in 2018, 2019 and 2020 to believe that there is/was a crime lawfully established to have being committed and that the crime is/was lawfully established or lawfully determined to have being committed by the former employer Touch of Fame Group through which I received the funds concern in this matter ?;*
- v. *Whether the initial complaint basis, Sworn affidavits, Warrants and or the initial legal basis for the warrants or ground(s) for the seizure in the first instance in 2018, 2019 and 2020 prior to September 2021, ARE IN COMPLIANCE WITH THE REQUIRED DUE PROCESS OF THE LAW, FUNDAMENTAL FAIRNESS, EQUAL PROTECTION OF THE LAW AS STIPULATED IN THE CONSTITUTION OF THE UNITED STATES ?;*
- vi. *Whether the INITIAL sworn affidavit of complaint related to the initial warrants, ground(s) or facts or evidence amongst others INITIALLY CITED OR RELATED therein or referred to as probable cause therein, in the initial sworn affidavit of complaint in the years 2018, 2019 and 2020, - **after investigation, to obtaining the warrants in those said years** in this matter or related matters, **and obtained** the said warrants, - **ARE IN COMPLIANCE WITH THE DUE PROCESS OF THE LAW AMONGST OTHERS GUARANTEED IN THE CONSTITUTION AND CAN STILL SUSTAIN THE SAID SAME WARRANTS PRIOR TO SEPTEMBER 2021 AND OR ARE IN VIOLATION OF THE CONSTITUTION OF THE UNITED STATES OF AMERICA OR THE REQUIRED DUE PROCESS OF THE LAW, SO THAT THEY ARE NULLITIES OR NULL AND VOID INCLUDING THE PROCEEDINGS EVEN BEFORE REVERSAL AS SETTLED LAW?***
- vii. *Whether the referred to NULLITIES OR NULL AND VOID WARRANTS, PROCEEDINGS, INITIAL RELATED AFFIDAVITS OF COMPLAINT AMONGST OTHERS as stated or quantify in the preceding paragraph HEREIN UNDER "vi" above, **CAN BE AMENDED AS IN THE INSTANT MATTER AND RELATED MATTERS** to NOW sustain or obtain further warrants (orders) for seizure and or forfeiture amongst others as in these instant matter or related matters,*

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DESPITE IT IS SETTLED LAW THAT "Any order or judgment based on a void order or judgment is void" ?;

viii. *Whether this honorable Court has/had exceeded or not its powers of authority, to have granted or issued ANY warrant(s) or further warrant(s) in this matter and or related matters, in violation of the required due process of the law, equal protection of the law, FUNDAMENTAL FAIRNES amongst others guaranteed in the Constitution and or the Constitution of the United States of America, where it is settled law that "Courts are constituted by authority and they cannot go beyond that power delegated to them. If they act beyond that authority, and certainly in contravention of it, their judgements and orders are regarded as nullities; they are not voidable, but simply void, and this even prior to reversal" ?*

20. I hereby leave the above questions of law to this honorable Court for correct answers and interpretation of the law as the arbiter of Justice, in the interest of Justice and or public policy and the oath or beholden in duties to the Constitution of the United States of America.
21. I have NOT COMMITTED any fraud or money laundering, nor received any funds known to me to be proceeds of any crime;
22. I have NOT RECEIVED ANY funds from Worldpay whatsoever nor perform any activity whatsoever in relation to Worldpay or TOF Energy Corporation;
23. I am NOT aware of any existence of any fraudulent transaction(s) to have been performed by Touch of Fame Group in the State of Georgia or TOF Energy Corporation in the State of Georgia;
24. I am not aware of any e-Check processing Terminal registered at Georgia address in the name of Touch of Fame Group or TOF Energy Corporation, NEITHER do I have any clue of any transaction(s) or fraudulent transaction(s) whatsoever concluded or processed between Worldpay and Touch of Fame Group or TOF Energy Corporation;
25. I am only a contracted secretary to Touch of Fame Group as I already submitted to the United States Secret Service agents as exhibited in annexure "**OO 1**" herein, with well deserved salaries, allowances amongst others as paid in this instant matter as a Constitutional right and the demands under the Labor Act amongst others;
26. No one has the right to deny me the right to earn a living amongst others or deny me and or my families what's earned in payments as received legally in this instant matter, for my hard work labor performed outside the United States Jurisdiction at the request and on behalf of Touch of Fame Group;

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27. The payments I received for my hardwork as in this instant matter, **ARE NOT PROCEEDS OF ANY CRIME**, contrary to what were stated in the INITIAL SWORN AFFIDAVITS made in the years 2018, 2019, and 2020 prior to and after the amendments NOW made to the same sworn affidavit of complaint FOR FORFEITURE dated September 17th, 2021 in this matter and related matters;
28. The said Payments I received as the result(s) of my labor performed **are NOT involved** in any transaction or attempted transaction in violation of any crime or traceable to any crime **by way of lawfully valid evidence other than innuendos, misrepresentations of facts, hearsays, or false allegations and or another's concern(s) as learnt from the affidavit of complaint and or amended affidavit of complaint for forfeiture;**
29. The said Payments I received as the result(s) of my labor performed, **DO NOT CONSTITUTE or derived from any crime or unlawful activity, NOR constitute or derived from proceeds traceable to any violation of any offense or criminal act constituting any unlawful activity, by way of lawfully valid evidence other than innuendos, misrepresentations of facts, hearsays, or false allegations and or another's concern(s) as learnt from the affidavit of complaint and or amended affidavit of complaint for forfeiture;**
30. The said Payments I received as the result(s) of my labor performed **are NOT forfeitable "BY THE DISTRICT COURT, EASTERN DISTRICT MICHIGAN" or BY another, to the United States of America pursuant the 4th, 5th, 6th, 10th and 14th Amendments of the Constitution of the United States in conjunction with ARTICLE III Section 2 of the Supreme Constitution of the United States of America;**
31. And so here I respectfully come **as a hard working very patient "PRO SE LITIGANT" citizen before you and under GOD, seeking FOR to apply the true and correct interpretation of the law, as arbiter of justice in this matter and related matters, regardless of my race, color, ethnic background, religion, beliefs, gender amongst others, SO THAT ALL THAT THE CONSTITUTION OF THE UNITED STATES OF AMERICA STANDS TO REPRESENT, IS/ARE FULFILLED AND ACCOMPLISHED.**
32. I hereby humbly submit to this honorable Court and humbly urge this Court as a neutral arbiter of Justice, to protect my full rights as well as that of my wife and affiliated entity in this matter or related matters;

CONCLUSION:

33. I hereby adopt and rely on all the same pleadings, exhibits and authorities relied upon by the defendant(s) in the related cases under numbers 20-mj-30135 and 20-mc-50585, **AS ADDITIONAL SUPPORT TO MY MOTIONS AND RELIEFS SOUGHT.**
34. In light of the above, the defendant(s) respectfully urge this honorable court to so hold that, **IT IS** in the interest of justice, application of the correct Rule of Law or

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public policy or in compliance with the due process and equal protection of the law, to grant all the reliefs sought in the motion(s) and further to order the plaintiff to release and or return the said funds "DEFENDANTS IN REM" to myself and my wife forthwith, or with immediate effect or within 72 hours beginning from the day such order(s) from this honorable court is delivered;

Oyeniran A. Oyewale (Filer)

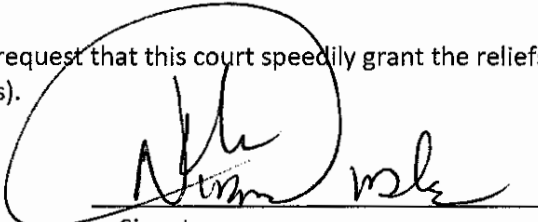
and on behalf / in the interest of self, Olubunmi Oyewale and For His Glory Project

I certify that I notified the Plaintiff, at the office of the Attorney General, Michael El-Zein via the email: michael.el-zein@usdoj.gov on this day September 24, 2021 with copies of the motion and this brief in support and the evidence thereto, but was unable to discuss my request and argument.

WHEREFORE, I humbly and respectfully request that this court speedily grant the reliefs or motions and order the requested relief(s).

Dated: Sept 24, 2021

Telephone Number: 401 527 2964


Signature

Oyeniran A. Oyewale

Name of Filer (*Pro Se Litigant*)

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